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Attorneys for Defendant
TONISHA MOORE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:22-CR-0030-JAM
)	
Plaintiff,)	AMENDED STIPULATION AND
)	PROPOSED ORDER FOR TEMPORARY
vs.)	RELEASE FROM CUSTODY TO ATTEND
)	SAN JOAQUIN COUNTY FAMILY COURT
TONISHA MOORE,)	
)	
Defendant.)	Judge: Hon. Jeremy D. Peterson
)	

IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States Attorney, through Elliot Wong, Assistant United States Attorney, counsel for Plaintiff, and Heather E. Williams, Federal Defender, through Assistant Federal Defender Rachelle Barbour, counsel for Defendant Tonisha Moore, with the agreement of United States Probation Office Molly McSorley, that Defendant Tonisha Moore may be ordered temporarily released from custody at the El Dorado County Jail on Wednesday, September 21, 2022 from 10:00 a.m. to 6:00 p.m. to attend a necessary hearing in Department 9D of the San Joaquin County Superior Court, Juvenile Dependency Division at 2:00 p.m. that afternoon, regarding custody and care of her three-year-old son. At that court appearance, Ms. Moore will meet with her dependency public defender, make her appearance in that case, and be assessed for an in-patient residential rehabilitation program that would allow her to work on reunification with her son.

The parties agree that Ms. Moore's father, Anthony Moore, will be allowed to pick Ms.

1 Moore up from custody at the El Dorado County Jail at 10:00 a.m., accompany her to court in
2 Stockton, and that he or her aunt (his sister) Leticia Hopkins will return her directly to the jail
3 after that court appearance no later than 6:00 p.m. The government has no opposition to this
4 temporary release under the terms and conditions listed below. Ms. Moore's probation officer
5 also concurs with this request.

6 Ms. Moore agrees to abide by the conditions the Court will impose.

7
8 Respectfully submitted,

9 DATED: September 16, 2022

HEATHER E. WILLIAMS
Federal Defender

11 /s/ Rachelle Barbour
12 RACHELLE BARBOUR
Assistant Federal Defender
Attorneys for Defendant

14 DATED: September 16, 2022

PHILLIP A. TALBERT
United States Attorney

16 /s/ Elliot Wong

17
18 ELLIOT WONG
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

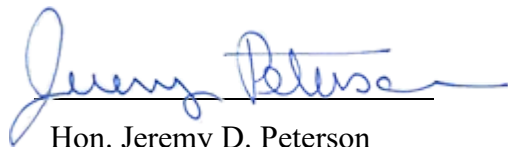
GOOD CAUSE APPEARING based on the stipulation of the parties.

IT IS HEREBY ORDERED, that Defendant Tonisha Moore be temporarily released from United States Marshal and El Dorado County Jail custody on Wednesday, September 21, 2022 at 10:00 a.m. to her father, Anthony Moore, who will accompany Ms. Moore during this temporary release to attend her family court hearing in San Joaquin Superior Court, Juvenile Dependency Division.

While on temporary release, Ms. Moore shall comply with the following terms and conditions in addition to the special and standard terms of her supervised release previously imposed:

1. You shall remain with your father, Anthony Moore, or your aunt, Leticia Hopkins, for the duration of your release.
2. You shall restrict your travel to and from the El Dorado County Jail and the San Joaquin Superior Court.
3. You must refrain from any use of alcohol, narcotic drug, or other controlled substance.
4. You shall return to the El Dorado County Jail by 6:00 p.m. on Wednesday, September 21, 2022.
5. Upon your return, you must submit to drug and/or alcohol testing if Probation directs you to do so.

Dated: September 16, 2022



Hon. Jeremy D. Peterson
United States Magistrate Judge